REMARKS/ARGUMENTS

Claim Rejection under 35 U.S.C. § 103

Claims 1 and 4-6 are rejected under 35 U.S.C. 103(a) as being un-patentable over Thompson et al. (Pub. No. 2002/0022483, hereinafter "Thompson") in view of Nii (Pub. No. 2002/0065730, hereinafter "Nii"). Claims 2-3 and 7-8 are rejected under 35 U.S.C. 103(a) as being un-patentable over Thompson in view of Nii and further in view of Ketola (Patent No. 6,112,099, hereinafter "Ketola").

One criteria required for establishing a prima facie case of obviousness is that "the prior art reference (or references when combined) must teach or suggest all the claim limitations." (Please see MPEP 2143.)

With respect to independent claims 1 and 6, the Applicant respectfully submits that Thompson and Nii in combination do not disclose every limitation recited in claims 1 and 6.

Specifically, first, Thompson does not disclose at least the following limitations recited in claims 1 and 6: (1) when a terminal enters a radio communication area of a first access point which is one of said multiple access points, said terminal gains access to said first access point to *reserve acquisition of a selected content* via the Internet; (2) the first access point comprises an input module that inputs *content identification information for identifying the selected content for pickup, location specification information for specifying a location outside the radio communication area of said first access point as a pickup location of the selected content*, and receiver identification information for identifying a person who picks up the selected content, through an access from said terminal entering the radio communication area of first access point; and (3) the first access point also comprises an information transmission module that *maps* the input receiver identification information to information on the selected content for pickup and *transmits the mapped information to said specified second access point* via the Internet.

The outstanding office action indicates that Thompson discloses the above limitations recited in claims 1 and 6. Thompson discloses a system and method "for providing access to multiple wireless service providers (WSPs) on a share network infrastructure." The network has multiple access points (APs). "Each AP 'listens for' or detects identification information associated with numerous WSPs. When the AP receives the identification information from the PCD, it determines the VAP/WSP for the PCD using the identification information. Network access is then provided to the PCD through the determined WSP at the determined access level." (Please see Thompson, Abstract).

Thompson discloses a usual terminal accessing the Internet via access points to order contents in advance. With Thompson, a reserved content is supposed to be received by the *same* PC that makes the reservation, which means that Thompson carries out operations that are different from those for a reserved content that is supposed to be picked up at *another*, i.e. different, access point. (Please see Thompson, paragraphs [0076]-[0079] and [0090]-[0091].)

Each access point in Thompson functions *independently* of the other access points. There is no communication of any kind between the access points. The identification information for a user is stored in the user's PCD. (Please see Thompson, paragraph [0031].) Each access point listens for any PCD coming within its range. Once a user is authorized based on his identification information at a particular access point, the user is granted a specific level of access to the network at that access point. (Please see Thompson, paragraph [0091].) When the user moves to another access point, he is re-authorized by the new access point.

Nowhere in Thompson describes (1) a user reserving certain specific content at one access point in order to pick up that reserved content at another specified access point; and (2) the first access point mapping the content reservation information made by the user and transmitting the mapped information to the second access point where the user has specified as the pick-up location.

Second, Thompson does not describe any information related to the second access point, as indicated in the outstanding Office Action. Nii does not disclose at least the following limitation recited in claims 1 and 6: the second access point comprises a storage module that stores the selected content for pickup, which is acquired through an access to a Web server on the Internet *based on the content identification information and is mapped to the receiver identification information.*

The outstanding office action indicates that Nii discloses the above limitation recited in claims 1 and 6. Nii discloses "a terminal device, a memory module and a system for and method of distributing electronic content." (Please see Nii, abstract.) Simply, one IC card contains authorization information about a host, and another IC card contains authorization information about a user. At a particular access point, the user insert the user IC card into the system, and the user IC card is compared to the host IC card for authorization. Depending on the type of authorization on the user's IC card, the user is permitted to obtain selected content *already stored* at the access point. (Please see Nii, paragraphs [0016].)

At each access point, "a number of multimedia files are stored in a content provider." "An input device is utilized to select a multimedia file from the *stored* multimedia files, and

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an output device is utilized to provide the content of a selected multimedia file." (Please see Nii, paragraphs [0016].) Thus, with Nii, the content stored at an access point is *generic content*, and user simply selects a part of the stored content for download. All users select from the same stored content based on individual user's desires. However, the stored content is not originally specified and reserved by any specific users.

In addition, the content may be selected and transferred "according to predetermined tailoring information." The tailoring information is stored "on a memory module, which is separate from and releasably attachable to the terminal device." (Please see Nii, paragraph [0017].) This indicates that there is no user reservation for the selected content at another access point, since any tailoring information is stored on a memory module. This is also no mapping and transmitting of the tailoring information from one access point to another.

Nowhere in Nii describes that the stored content at the access point is based on the *mapped* content information transmitted by and from the first access point to the second access point.

To summarize, although Thompson and Nii both describe a system with multiple access points from which a user may access the Internet or download stored content information, the access points in Thompson and Nii do not function in association with each other, but rather independently of each other. A user may go to any access point and obtain access to the Internet or download selected content based on the user's access authorization.

On the other hand, with the claimed invention, a user gains access to a first access point to reserve acquisition of a selected content via the Internet, and then gains access from a second access point to pick up the reserved content. The configuration that reserves acquisition of a selected content and the configuration that picks up the reserved content are *not* intended to function singularly. If a configuration that is designed to acquire a reserved content later on is used, there should be another configuration for reserving the content in advance. Making a reservation and acquiring the reserved items are a series of operations.

In other words, there is a close connection between what a user does at the first access point (reserve content) and at the second access point (pick up the previously reserved content). The content waiting for the user at the second access point is not just any random content that the user may be interested in, but the specific content that the user has requested earlier. The reason a user reserves for the content at the first access point and picks up the same reserved content at the second access point is that the user does not have to wait for the content when he reaches the second access point. By the time the user reaches the second access point, the content is already stored there for him to access and download.

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For these reasons, it is respectfully submitted that Thompson and Nii in combination do not disclose *a configuration where acquisition of a content is reserved at one access point and the same content is acquired later at another access point*, as effectively required by independent claims 1 and 6. Therefore, claims 1 and 6 are patentably distinct from the combination of Thompson and Nii.

Dependent claims 2-5 and 7-8 directly or indirectly depend from claims 1 and 6 respectively and are therefore respectfully submitted to be patentable over the art of record for at least the reasons set forth above with respect to the independent claims. Further, these dependent claims recite additional limitations that when considered in the context of the claimed invention further patentably distinguish the art of record.

CONCLUSION

Applicants respectfully submit that all pending claims are in proper form and are in condition for allowance, and request a Notification of Allowance to that effect. It is believed that no fee is due at this time. Should any fee be required for any reason related to this document, however, then the Commissioner is hereby authorized to charge said fee to Deposit Account No. 50-0388, referencing Docket No. MES1P076. The Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below with any questions or concerns relating to this document or application.

Respectfully submitted,

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